

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

In re: Gold King Mine Release in San Juan
County, Colorado on August 5, 2015

This Document Relates to:
ALL CASES

No. 1:18-md-02824-WJ

**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME
REGARDING PERSONAL JURISDICTION MOTIONS**

In order to accommodate ongoing discussions to resolve this matter, the State of New Mexico and the New Mexico Environment Department (together “New Mexico”), the Navajo Nation, Kinross Gold U.S.A., Inc. (“KGUSA”), Kinross Gold Corporation (“KGC”), and Sunnyside Gold Corporation (“SGC”) hereby stipulate to the following extension of time for New Mexico and the Navajo Nation to respond to: (1) *Kinross Gold U.S.A., Inc. and Kinross Gold Corporation’s Motion for Summary Judgment on the Claims of New Mexico, the Navajo Nation, Utah, and the Allen Plaintiffs: Personal Jurisdiction* (Dkt. 866); and (2) *Sunnyside Gold Corporation’s Motion for Summary Judgment on Grounds of Lack of Personal Jurisdiction* (Dkt. 868) (the “Personal Jurisdiction Motions”).

1. New Mexico and the Navajo Nation shall be given an extension to file and serve response(s) to the Personal Jurisdiction Motions, making such response(s) due January 8, 2020.
2. SGC, KGUSA, and KGC shall have until January 22, 2021 to file and serve any reply brief(s) in support of the Personal Jurisdiction Motions as to New Mexico and the Navajo Nation.

Dated: December 23, 2020

Respectfully submitted,

/s/ William J. Jackson

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**[PROPOSED] ORDER FOR EXTENSION OF TIME REGARDING PERSONAL
JURISDICTION MOTIONS**

Based on the stipulation among the State of New Mexico and the New Mexico Environment Department (together “New Mexico”), the Navajo Nation, Kinross Gold U.S.A., Inc. (“KGUSA”), Kinross Gold Corporation (“KGC”), and Sunnyside Gold Corporation (“SGC”), and for good cause shown, IT IS HEREBY ORDERED as follows:

1. New Mexico and the Navajo Nation shall file and serve their response(s) to (1) Kinross Gold U.S.A., Inc. and Kinross Gold Corporation’s Motion for Summary Judgment on the Claims of New Mexico, the Navajo Nation, Utah, and the *Allen* Plaintiffs: Personal Jurisdiction (Dkt. 866) and (2) Sunnyside Gold Corporation’s Motion for Summary Judgment on Grounds of Lack of Personal Jurisdiction (Dkt. 868) on or before January 8, 2020.

2. KGUSA, KGC, and SGC shall file and serve any reply brief(s) in support of the same motions as to New Mexico and the Navajo Nation on or before January 22, 2021.

IT IS SO ORDERED.

Dated: December __, 2020

Special Master Hon. Alan C. Torgerson

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2020, a true copy of the foregoing document has been served on all counsel of record by the Court's CM/ECF electronic filing system.

/s/ William J. Jackson

William J. Jackson